

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

TERRELL MANUEL,)	
)	
and)	
)	
CHARLES E. WHITE,)	
)	
for themselves and on behalf of all)	
similarly situated individuals,)	
)	CASE NO. 3:14-CV-238
Plaintiffs,)	
)	
v.)	
)	
WELLS FARGO BANK,)	
NATIONAL ASSOCIATION)	
)	
Defendant.)	

MOTION TO EXCEED PAGE LIMITS

COMES NOW Defendant Wells Fargo Bank, N.A. (hereinafter “Defendant” or “Wells Fargo”), by counsel, and hereby moves this Court to for leave to exceed the page limits set forth in Local Rule 7(F) for good cause shown. In support, Defendant states the following:

1. Plaintiffs’ initial Complaint and subsequent two amended Complaints alleged two violations of the Fair Credit Reporting Act. Because of the prior summary judgment deadline imposed by this Court, Defendant prepared a motion for summary judgment as to those claims. The memorandum in support of that motion was fewer than 30 pages in length.

2. However, Plaintiffs’ third amended Complaint added an additional claim that, although not as legally-dense as Plaintiffs’ prior claims, must be addressed in Defendant’s memorandum in support of its motion for summary judgment.

3. Defendant is now prepared to file its Motion for Summary Judgment on or before the April 30, 2015 due date imposed by this Court. Defendant plans to attach the portion of its arguments that exceeds 30 pages in length as an exhibit to its memorandum in support. If this Court is inclined to grant the instant motion, Defendant requests that its attachment be considered as if it was contained within the body of its memorandum in support of motion for summary judgment.

4. Defendant requests an additional five pages – up to 35 in total – in which to present its summary judgment arguments.

WHEREFORE, Defendant FedEx Freight, Inc., by counsel, respectfully requests that this Court grant its request for leave to exceed the page limit set by Eastern District of Virginia Local Civil Rule 7(F) .

Dated April 28, 2015

Respectfully Submitted,

WELLS FARGO BANK, NATIONAL ASSOCIATION

By /s/ Jimmy F. Robinson, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of April, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel for Plaintiffs:

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